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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN F. ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; UNITED STATES CUSTOMS
AND BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

DECLARATION OF TERRI PREEG
RIGGSBY

1. My name is Terri Preeg Riggsby. I make this declaration in support of Oregon Attorney General Ellen Rosenblum's Motion for Temporary Restraining Order in the above captioned action.

2. I am a resident of the State of Oregon and have been since 1998. I currently reside in Multnomah County.

3. I have participated in marches, community events, including such activities in Portland, Oregon, such as the 2017 Women's March. During such events I have felt safe in the exercise of my rights to assemble and express my views on political, cultural, and social matters.

4. I am a parent of 13 year old and believe working for social justice, including an end to police brutality and racial inequity, is important to create a better world for my child and part of my obligations as parent and as a citizen.

5. On or about July 17, 2020 I learned via social media and news reports that multiple armed, unidentified individuals with military or quasi-military equipment detained an unarmed, non-resisting pedestrian in downtown Portland, forced him into an unmarked vehicle, and departed without identifying themselves to the individual detained, or bystanders.

6. I have seen video footage of this abrupt and violent detention.

7. Since that time I have learned additional information indicating that the armed persons who detained the pedestrian were employed by one or more federal agencies.

8. I do not feel safe participating in Black Lives Matter ("BLM") or other community events in the vicinity of the Mark Hatfield Federal Courthouse in Portland due to the risk of being detained by unidentified paramilitary personnel.

9. I have recently recovered from back surgery and have permanent limited mobility. I would like to participate in public demonstrations supporting Black Lives Matter activists, and demanding an end to police brutality. Friends and acquaintances have invited me this week to participate in the unarmed, peaceful, assembly of protestors known as the "Wall of Moms" in downtown Portland, but I declined because of my disability and high risk of injury.

10. As a child I resided with my family in Haiti, during the Duvalier regime. Militarized police presence, unchecked police violence, detention of dissidents, and paramilitary intimidation created a climate of fear and discouraged public criticism of the government. This

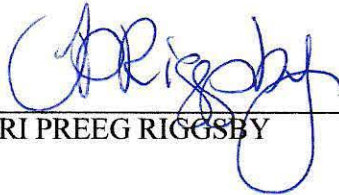
early formative experience reinforced for me the importance of democratic, constitutional norms in policing.

11. The lack of explanation given for detaining pedestrians, the unidentified armed individuals, and unmarked vehicle associated with the events above all cause me to fear being in the vicinity of the federal courthouse during BLM and anti-police brutality events and assemblies.

12. I do not feel comfortable with the risk of being abruptly detained for an indefinite period because the effect such a traumatic event could have on my child, my spouse, and my physical wellbeing.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.



TERRI PREEG RIGGSBY